

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

GEORGE A. JACKSON, et al.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	C. A. No. 05-823-***
	)	
STANLEY TAYLOR, et al.,	)	JURY TRIAL REQUESTED
	)	
Defendants.	)	

**DEFENDANT CHRIS SENATO'S RESPONSE TO PLAINTIFF'S REQUEST  
FOR ADMISSIONS**

Pursuant to Federal Rule of Civil Procedure 36, Defendant Chris Senato responds to Plaintiff's Request for Admissions as follows:

1. Heating, ventilation, and air condition (HVAC) related processed designed to regulate ambient conditions within buildings for comfort or for industrial purposes.

**RESPONSE:** Answering Defendant is without sufficient knowledge to admit or deny.

2. Heating an area raises temperature in a given space to a more satisfactory level than that of the atmosphere.

**RESPONSE:** Objection. Defendant does not understand what is meant by the term "satisfactory." Without waiving this objection, it is denied.

3. Ventilation, either separately or in combination with the heating or air condition system controls both the supply and exhaust of air within given areas in order to provide sufficient oxygen to the occupants and to eliminate odors.

**RESPONSE:** Answering Defendant is without sufficient knowledge to admit or deny this statement.

4. Air conditioning designates control of the indoor environment year round to create and maintain desirable temperature, humidity, [sic] air circulation, and purity for the occupants of that space or for the industrial materials that are handled or stored there.

**RESPONSE:** Answering Defendant is without sufficient knowledge to admit or deny.

5. Plaintiff George A. Jackson's July 19, 2005 grievance was filed as an "Emergency Grievance" and received by the SCI Warden's Office on July 20, 2005.

**RESPONSE:** Answering Defendant has no knowledge.

6. On July 20, 2005, SCI Food Service staff filed an [sic] report pertaining to contaminated beef cube steak being discovered by [sic] inmate during his dinner meal.

**RESPONSE:** Admitted.

7. Food Service Supervisor Joseph Adkins carried out an investigation which included an inspection of the kitchen area.

**RESPONSE:** Admitted.

8. The SCI main kitchen area was found to be well maintained.

**RESPONSE:** Admitted.

9. The source of the contamination could not be conclusively determined.

**RESPONSE:** Admitted.

10. Prior to July 2005, the east and west alcove doors of the SCI main kitchen were not self closing doors.

**RESPONSE:** Denied.

11. Former inmate Joshua Hudson suffered a serious injury to his fingers when one of the SCI main kitchen alcove doors slammed against his fingers while in the door frame in 2006.

**RESPONSE:** Objection. This Request has no relevance to Plaintiff's claims, requests information beyond the scope of rule 26, and is not designed to lead to the discovery of admissible evidence.

12. DOC maintenance crew repair both east and west alcove doors to become self closing after the injury of Joshua Hudson.

**RESPONSE:** Objection. See response to No. 11. Without waiving this objection it is denied.

13. Plaintiff's original and amended complaints both alleged "contaminated food being sent out to the prison population."

**RESPONSE:** Admitted.

14. During the hot summer months when temperature [sic] rise and/or exceed 100 degree [sic] inmate kitchen workers are instructed to drink plenty of water (or liquid).

**RESPONSE:** Admitted.

15. Consequences of drinking excessive water or liquids would prompt individuals to increase more trips to a bathroom to relieve themselves.

**RESPONSE:** Objection. Defendant does not understand what is meant by the term "excessive." Without waiving this objection, it is denied.

16. SCI main kitchen only has (1) toilet seat in the inmate bathroom for 22-25 inmate kitchen workers per shift.

**RESPONSE:** Admitted.

17. Defendants Knight and Senato both do not maintain any certification records of frequent and regular inspection of the SCI main kitchen and equipment.

**RESPONSE:** Denied.

STATE OF DELAWARE  
DEPARTMENT OF JUSTICE

/s/ Catherine Damavandi  
Catherine Damavandi, ID#3823  
Deputy Attorney General  
Department of Justice  
Carvel State Bldg., 6<sup>th</sup> Fl.,  
820 N. French Street  
Wilmington, DE 19801

Dated: November 26, 2007

***CERTIFICATE OF SERVICE***

I hereby certify that on November 26, 2007, I electronically filed the attached *Defendant Chris Senato's Response to Plaintiff's Request for Admissions* with the Clerk of Court using CM/ECF. I hereby certify that on November 26, 2007, I have mailed by United States Postal Service, the document to the non-registered parties on the attached list.

STATE OF DELAWARE  
DEPARTMENT OF JUSTICE

/s/ Catherine Damavandi  
Catherine Damavandi, ID#3823  
Deputy Attorney General  
Department of Justice  
Carvel State Bldg., 6<sup>th</sup> Fl.,  
820 N. French Street  
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**Service List of Non-Registered Parties**

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